

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

IN RE: TAASERA LICENSING LLC,  
PATENT LITIGATION

THIS DOCUMENT RELATES TO CASE NO.  
2:23-cv-00113-JRG

MDL No. 2:22-md-3042-JRG

TAASERA LICENSING LLC

*Plaintiff,*

v.

PALO ALTO NETWORKS, INC.

*Defendant.*

Case No. 2:23-cv-00113-JRG

**JURY TRIAL DEMANDED**

**DEFENDANT PALO ALTO NETWORKS' UNOPPOSED MOTION FOR LEAVE TO  
AMEND ITS INVALIDITY CONTENTIONS FOR THE '137 PATENT**

Pursuant to Local Rule 3-6(b), Defendant Palo Alto Networks, Inc. (“PAN”) requests leave to amend its invalidity contentions regarding U.S. Patent No. 7,673,137 (the “‘137 patent”) by serving the invalidity chart attached to this Motion as Exhibit 1.

Good cause exists to grant this motion. Exhibit 1 was previously served by other Defendants in this MDL as part of their joint invalidity contentions on March 28, 2023. When PAN timely served its invalidity contentions on April 29, 2023, it inadvertently omitted serving a chart for the ChakraVyuha reference. PAN’s cover pleading, however, made clear that PAN intended to rely on the ChakraVyuha reference. *See, e.g.*, Exhibit 2 (excerpt of PAN’s invalidity contention cover pleading with references to ChakraVyuha highlighted) at 11-12, 33, 80. Thus, PAN seeks leave to serve the same chart previously served on Plaintiff by other Defendants (which covers all claims asserted against PAN) to correct its inadvertent service oversight. PAN is not

seeking leave to modify, amend, or supplement that chart, solely to rely on the exact chart that was previously served by other Defendants. Because Plaintiff already received that chart from other Defendants and because PAN's cover pleading made clear that PAN was relying on ChakraVyuha, Plaintiff is not prejudiced by this request.

PAN conferred with Plaintiff regarding this Motion and Plaintiff stated they do not oppose the requested relief.

Accordingly, PAN respectfully requests that the Court grant leave to amend its invalidity contentions regarding U.S. Patent No. 7,673,137 (the “137 patent”) by serving the invalidity chart attached to this Motion as Exhibit 1.

Dated: November 2, 2023

Respectfully submitted,

By: /s/ Kelly C. Hunsaker

Melissa Richards Smith  
State Bar No. 24001351  
[melissa@gillamsmithlaw.com](mailto:melissa@gillamsmithlaw.com)  
**GILLAM & SMITH, LLP**  
303 South Washington Avenue  
Marshall, TX 75670  
Telephone: 903-934-8450  
Facsimile: 903-934-9257

Kelly C. Hunsaker  
[KHunsaker@winston.com](mailto:KHunsaker@winston.com)  
Michael R. Rueckheim  
State Bar No. 24081129  
[MRueckheim@winston.com](mailto:MRueckheim@winston.com)  
Eimeric Reig-Plessis  
[EReigPlessis@winston.com](mailto:EReigPlessis@winston.com)  
**WINSTON & STRAWN LLP**  
255 Shoreline Drive, Suite 520  
Redwood City, CA 94065  
Telephone: (650) 858-6500  
Facsimile: (650) 858-6550

**ATTORNEYS FOR PALO ALTO  
NETWORKS, INC.**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on November 2, 2023, a true and correct copy of the above and foregoing document has been served on all counsel of record who are deemed to have consented to electronic service via the Court's CM.ECF system per Local Rule CV-5(a)(3).

*/s/ Kelly C. Hunsaker* \_\_\_\_\_

Kelly C. Hunsaker

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that Counsel for Plaintiff and Counsel for Defendant met and conferred per Local Rule CV-7(h) and that this motion is unopposed by Counsel for Plaintiff.

*/s/ Kelly C. Hunsaker* \_\_\_\_\_

Kelly C. Hunsaker